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Attorney for Emmanuel Nava

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:24-cr-00054-DJC
Plaintiff,)	STIPULATION REGARDING
)	EXCLUDABLE TIME PERIODS
vs.)	UNDER SPEEDY TRIAL ACT; ORDER
EMMANUEL NAVA and JOSE PEDRO)	Date: May 23, 2024
NAVA,)	Time: 9:00am
Defendants.)	Judge: Hon Judge Daniel J. Calabretta

STIPULATION

1. By previous order, this matter was set for status on May 23, 2024.
2. By this stipulation, the defendants now move to continue the status conference until August 15, 2024, at 9:00 a.m., and to exclude time between May 23, 2024, and August 15, 2024 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for the defendants desire additional time to review the discovery, counsel with their clients, conduct investigation and research related to the criminal charges, and otherwise prepare for trial.

- 1 b) Counsel for the defendants believe that failure to grant the above-requested
2 continuance would deny them the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.
4 c) The government does not object to the continuance.
5 d) Based on the above-stated findings, the ends of justice served by continuing
6 the case as requested outweigh the interest of the public and the defendant in a
7 trial within the original date prescribed by the Speedy Trial Act.
8 e) For the purpose of computing time under the Speedy Trial Act, 18
9 U.S.C. § 3161, et seq., within which trial must commence, the time period of
10 May 23, 2024 to August 15, 2024, inclusive, is deemed excludable pursuant to
11 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a
12 complex case and it results from a continuance granted by the Court at
13 defendant's request on the basis of the Court's finding that the ends of justice
14 served by taking such action outweigh the best interest of the public and the
15 defendant in a speedy trial.
16 4. Nothing in this stipulation and order shall preclude a finding that other provisions
17 of the Speedy Trial Act dictate that additional time periods are excludable from
18 the period within which a trial must commence.

19
20 **IT IS SO STIPULATED.**

21
22 DATED: May 17, 2024

PHILLIP A. TALBERT
United States Attorney

23
24 /s/ Cameron Desmond
25 CAMERON DESMOND
26 Assistant U.S. Attorney
27
28

1 DATED: May 17, 2024

PHILLIP A. TALBERT
United States Attorney

2
3 /s/ Emily Sauvageau
4 EMILY SAUVAGEAU
Assistant U.S. Attorney

5
6 DATE: May 17, 2024

7 /s/ Thomas A. Johnson
8 THOMAS A. JOHNSON
Attorney for Emmanuel Nava

9
10 DATE: May 17, 2024

11 /s/ Neat Allen Sawyer
12 NEAT ALLEN SAWYER
13 Attorney for Jose Pedro Nava

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19 **ORDER**

20
21 IT IS SO FOUND AND ORDERED this 17th day of May 2024

22
23 /s/ Daniel J. Calabretta
24 THE HONORABLE DANIEL J. CALABRETTA
25 UNITED STATES DISTRICT JUDGE